

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24050

**MOTION FOR LEAVE TO FILE SPANISH DOCUMENTS AND REQUESTING A  
TERM TO FILE CERTIFIED TRANSLATION BY JULY 6, 2023**

To the Honorable United States District Judge Laura Taylor Swain:

**COMES NOW**, International Traffic Systems, LLC (“ITS”), by and through the undersigned legal counsel, respectfully alleges and prays as follows:

ITS filed its *Response to the Five Hundred Seventieth Omnibus Objection (Substantive of the Commonwealth of Puerto Rico, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways And Transportation Authority, And Puerto Rico Public Buildings Authority To Claims For Which Debtors Are Not Liable. See Dkt. No. 24634 (“Response”))*. The Response contains the unsown declaration under penalty of perjury issued by Jonathan Miller on January 22, 2023 (the “Declaration”) (Dkt. No. 24634-1), which Declaration includes certain documentation in the Spanish language. *See Dkt. Nos. 24634-3, 24634-5 - 24634-8, 24634-20 - 24634-21, 24634-26, and 24634-40 - 24634-41.*

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

ITS hereby moves for leave to file Dkt. Nos. 24634-3, 24634-5 - 24634-8, 24634-20 - 24634-21, 24634-26, and 24634-40 - 24634-41 in their original Spanish language, and for a term of two (2) weeks to file a certified English translation pursuant to Local District Court Rule 5(c).

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>th</sup> day of June 2023.

**CERTIFICATE OF SERVICE:** In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the *Sixteenth Amended Notice, Case Management and Administrative Procedures* Order (Docket No. 20190-2 of Case No. 17-03283 (LTS)) (the “CMP Order”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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